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March 26, 2018

VIA ECF AND E-MAIL

The Hon. Judge Cathy Seibel
The Hon. Charles L. Brieant Jr.
Federal Building and United States Courthouse
300 Quarropas St., Courtroom: 621
White Plains, NY 10601-4150
chambersnysdseibel@nysd.uscourts.gov

Re: *Can't Stop Productions, Inc. v. Sixxvus, Ltd. et al.* 7:17-cv-06513-CS

Hon. Judge Seibel:

We represent the defendants in the above referenced action. Pursuant to rule 1.E of Your Honor's Individual Practices, and as discussed at the March 16, 2018 hearing, we write to request an extension of time to respond to Karen Willis' Complaint ("Intervenor's Complaint") filed March 6, 2018, (*see* Dckt. No. 117), and to propose a briefing schedule on Intervenor's motion to intervene. Defendants' response to Intervenor's Complaint is currently due on March 27, 2018.

As discussed at the hearing, it is Defendants' position that it would be in the interest of efficiency and judicial economy for Intervenor's motion to intervene to be decided prior to Defendants responding to Intervenor's Complaint, as the outcome of that motion may affect what claims Intervenor can assert.

Following the hearing held on Friday March 16, 2018, counsel for Defendants conferred with Intervenor by email and agreed to the following briefing schedule on Intervenor's motion to intervene: Defendants' opposition to be filed on or before April 13, 2018, and Intervenor's Reply to be filed on or before May 8, 2018. The parties further agreed to extend Defendants' time to respond to Intervenor's Complaint until fourteen (14) days after this Court's decision on Intervenor's motion to intervene.

As such, Defendants respectfully request that the Court so order the above briefing schedule on Intervenor's motion to intervene and extend Defendants' time to respond to Intervenor's Complaint until fourteen (14) days after this Court's decision on that motion.

There have been no prior requests to extend the time to respond to Intervenor's Complaint. The response to Intervenor's motion to intervene was previously stayed by the Court at the December 8, 2017 hearing as set forth in the December 14, 2017 Order. All parties consent to this request.

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We appreciate the Court's time and consideration, and should Your Honor need any further information or if the Court would like to discuss any of the above, we are available at the Court's convenience.

Respectfully Submitted,

ADELMAN MATZ P.C.

A handwritten signature in black ink, appearing to be 'SM' with a colon, representing Sarah M. Matz.

Sarah M. Matz, Esq.

Cc. (Via ECF and E-Mail)
Counsel for Plaintiff
Karen Willis